

Medina, Dayana

From: Montgomery, William <Montgomery@adeq.state.ar.us>
Sent: Friday, April 28, 2017 10:41 AM
To: Nann, Barbara
Cc: Medina, Dayana
Subject: RE: SIP development BART follow up question

Thank you Barbara. That is helpful.

From: Nann, Barbara [mailto:nann.barbara@epa.gov]
Sent: Friday, April 28, 2017 10:26 AM
To: Montgomery, William
Cc: Medina, Dayana
Subject: RE: SIP development BART follow up question

For both NM and OK, we used the BART 5 factor when a facility wishes to retire early an unit. This changes the remaining useful life #. Default remaining useful life in 5 factor BART determination is 30 years. We change the remaining useful life # (e.g. unit retire 2027 then remaining useful life is 10 years and then you proceed with BART using the 10 # instead of the 30. Typically that means the most stringent technology is eliminated. Most times that means an interim control technology that is cheap is needed but that may not be the case.) I am including Dayana because I may not have the exact example of how to calculate the change in useful life.

Barbara

From: Montgomery, William [mailto:Montgomery@adeq.state.ar.us]
Sent: Friday, April 28, 2017 10:20 AM
To: Nann, Barbara <nann.barbara@epa.gov>
Subject: SIP development BART follow up question

Barbara,

Have there been any examples of EPA considering a unit shutdown in a traditional BART analysis of some kind? I just want to consider all of our options before Domtar responds to our discussion yesterday?

Thanks,

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